

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. APPLICATION NO. 09/556,517
ATTORNEY DOCKET NO. Q58755

REMARKS

Claims 17-23, 25-27, and 86-97 are all the claims pending in the application.

The Examiner made the following acknowledgement of a deficiency in Dobbins
(emphasis supplied):

although *Dobbins does not clearly disclose selecting the destination of data in response to the network address included in the message addressed to any one of the plural addresses,*

Dobbins could easily be modified to assign unique addresses to each interface of the router. This would reduce the potential for sending data meant for a particular address to an incorrect address.

The Examiner's ground for rejection is unconvincing. In Dobbins, there is no discussion of any potential for sending data to an incorrect address. In computerized networking systems, the potential for sending data to an incorrect address is of course virtually none because computers reliably look up address information and send to the address located. If the IP address were incorrect in the tables of the DNS server, then the sending of datagrams to the incorrect address would be reliably accomplished, and providing for multiple addresses in Dobbins would not handle such a problem.

Furthermore, the *ease* with which the prior art can be modified is not the test for obviousness, and the difficulty of making a change to the prior art is not the test of patentability. What Dobbins teaches in the main is assigning a single address to multiple interfaces of the same router. This is, in a sense, the opposite of a router having a plurality of IP addresses.

Moreover, the range of addresses mentioned in the Dobbins passage is a range of addresses of a workgroup, not addresses of the router.

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The Examiner's case for obviousness is based on a prior art reference that fails to teach or suggest the point Applicant has, in previous responses, stressed as a basis for patentability -- the requirement of "responding to a communications message which is received ... and is addressed to the router at any one of a plurality of predetermined IP addresses of the router". The Dobbins patent lacks this feature, as the Examiner notes. In addition, no prior art reference yet identified has the feature. If the "easy" change were as desirable and helpful as suggested in the ground of rejection, the Examiner should be able to find at least one prior art reference that includes the feature.

In any event, the ground of rejection does not amount to a prima facie case for obviousness because the Dobbins reference lacks the key feature mentioned above. The artisan of ordinary skill would not have (and could not have) been led by Dobbins in the manner suggested by the Examiner to produce the subject matter of either claim 20, or similar claim 25 without the knowledge of Applicant's own specification for guidance. It is thus respectfully submitted that the claimed invention would not have been obvious over Dobbins, and we think that this rejection must be withdrawn as to claims 20 and 25.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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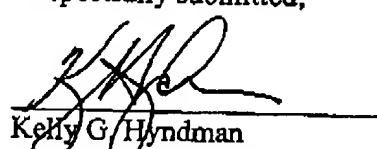
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